

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**IN RE:
BLUE CROSS BLUE SHIELD
ANTITRUST LITIGATION
(MDL NO. 2406)**

Master File No. 2:13-CV-20000-RDP

**This Document Relates to
Provider Track Cases**

**DECLARATION OF THE SPECIAL MASTER, MEDIATOR,
AND SETTLEMENT ADMINISTRATOR IN SUPPORT OF
PROVIDER PLAINTIFFS' MOTION FOR FINAL APPROVAL**

I, Edgar C. Gentle, III, declare:

1. I am the Special Master in this action. On December 4, 2024, I was appointed as Settlement Administrator for the Provider Track settlement. Doc. No. 3225 (Preliminary Approval Order). I have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could competently testify thereto.

2. Unless otherwise defined herein, all capitalized terms have the meanings ascribed to them in the Settlement Agreement, attached as Exhibit A to Provider Plaintiffs' Motion for Preliminary Approval of Proposed Class Settlement. Doc. No. 3192-2.


3. As Settlement Administrator and Special Master, I worked closely with the Provider Co-Lead Counsel and the Settlement Notice Administrator to ensure that the Notice Plan was implemented in accordance with the Preliminary Approval Order. The Settlement Notice Administrator has done an excellent job of implementing the Notice Plan, as well as processing opt-out requests and objections. In my opinion, Class Notice has clearly satisfied the requirements of the Preliminary Approval Order and constitutional due process.

4. I am also familiar with the work of Provider Co-Lead Counsel to educate Class Members about the settlement. From the filing of the preliminary approval motion to the deadline for opt-outs and objections, Provider Co-Lead Counsel and their colleagues have spoken with thousands of Class Members about the benefits of the settlement, both monetary and non-monetary, and the process for submitting settlement claims. Their work has been crucial to what I expect will be a very high rate of participation by Settlement Class Members.

5. I submitted an affidavit in support of preliminary approval of the Provider Settlement. Doc. No. 3192-6. I reiterate all statements that I made in that affidavit. I served as Mediator in this case through the time that the parties reached a settlement. All negotiations were at arm's length. For all the reasons that I expressed in my earlier declaration, the Settlement is fair, reasonable and adequate. Since the time of that declaration, expert healthcare economists have confirmed my opinion that the injunctive relief is extraordinary and extremely valuable to the Class Members. They have valued the injunctive relief at more than \$17.3 billion while recognizing that there are other beneficial parts of the Settlement that have a value that has not yet been quantified. This value is in addition to the Defendants' agreement to pay \$2.8 billion, the largest monetary settlement in a healthcare antitrust case in history.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this the 23rd day of April, 2025.



Edgar C. Gentle, III